

## **STATEMENT**

### **of the National Academic Contact Points for Recognition (ECTS, DS and Lisbon Recognition Convention) of the National Teams of Bologna Promoters / Experts, appointed by National Authorities**

#### Premise

The concept of Lifelong Learning does not only have a longitudinal dimension (learning from the cradle to the grave), but also a horizontal one (learning in different contexts, formal, informal, non formal). It seems that the main goal of any programme for LLL should be both to encourage the continuation of learning during the whole life of an individual and to facilitate the transfer, validation and recognition of the learning acquired in different learning environments or educational sectors (academic and vocational, formal and non formal). This seems especially desirable when learning takes place at the same level in the educational sequence, although in different settings. If the learner is really to be placed at the centre of the whole educational process, it is what s/he has learnt that has to be considered, recognised, and possibly transferred without any preconception regarding how and where s/he has achieved his/her results.

#### EQF for LLL

Since the Bologna Process has already approved a Qualifications Framework for Higher Education, the decision made by the European Commission to launch a Framework for LLL, although claiming to cover all education, risks being limited to the vocational sector. In fact, we are now faced with two separate frameworks which are based on different methodologies and different level descriptors. This will lead to:

- distortion of the global unifying concept, longitudinal and horizontal, of LLL;
- creation of artificial boundaries rather than building of bridges between learning taking place in different settings;
- confusion in the 27 EU member states and the candidate countries and their institutions, who are already committed to the implementation of the Framework for Qualifications for the EHEA.
- confusion for the future learner.

While higher education is trying to open its doors to all forms of learning, formal, informal and non-formal, this new initiative is instead emphasizing the differences between HE and VET.

#### ECVET

The separation of these two sectors, as reflected by the two frameworks, is further emphasized by the proposal to develop a separate credit system for VET. This is a surprising and unnecessary development given the existence of ECTS, which has been successfully developed into a system which can cope with all types of learning. The strength of today's ECTS is based on the consistent use of the concepts of student workload and learning outcomes. The system is now accepted by practically all the Bologna signatory countries and in a growing number of cases is embedded in national legislation. As a consequence, higher education institutions are engaged in its full implementation. Instead of investing in the development of ECVET it would seem wiser and more cost effective to fully explore the potential of ECTS for vocational education and training and to engage in an open dialogue between HE and VET which has not yet been initiated.

Even though ECTS started as a credit transfer system, thanks to the Bologna process, it has now developed into a fully-fledged accumulation system. Originally workload-based, it has now evolved into a well-balanced approach to curriculum design which is based both on the descriptions of desired learning outcomes and the estimate of the time required to achieve them. These two elements are interlinked and also closely related to teaching/learning conditions. It is through these ECTS-based criteria that many HE institutions with experience in this field have reconstructed,

recognised and validated learning experiences of different types acquired in a variety of contexts. ECVET, although apparently similar to ECTS, claims its distinct nature in minimizing the workload dimension and concentrating on learning outcomes. It tries to develop an independent and articulated approach for allocating ECVET credits, which will create unnecessary boundaries between vocational education, even at higher levels, and higher education in general. No attempt at coordination has been made by involving ECTS experience in the development of the new ECVET system. The advantages of the complex and costly operation required to set up a new system are questionable, especially in a comprehensive LLL perspective.

Although ECVET focuses on learning outcomes, it cannot completely deny the role of workload, because, when the allocation of credits is discussed in the consultation document, it is stated that these should be based on:

- a reference to a real or notional average length of programme
- real or notional learner workload in a formal learning context.

The further criteria proposed for credit allocation are importance of the contents and the real or notional learner efforts in an informal learning context. Those who are acquainted with the use of the concept of credits are very much aware of the fact that ‘importance’ and ‘effort’ can not be determined in an objective way. Precisely those two elements were discussed at length when ECTS was being developed. It was concluded at the time that they could not be used as a basis for credit allocation. Moreover, the use of workload makes a credit system learner-centred. It is therefore remarkable that the experience which has been built up concerning ECTS has not been used in the discussion about ECVET. Although the Commission advocates bridging the VET and the HE sector, it does the opposite in practice.

We notice that after years of discussion the ECVET project is still in the design stage. The working group that prepared ECVET has not yet come-up with a workable methodology. They state that ‘there are numerous methods for allocating credit points to qualifications and units. From the moment of the adoption of ECVET, the European Commission will support the diffusion of the most suitable methodologies as well as the development of new methodologies’. The EC asks future users to sign up for an approach that still has to be developed.

### Conclusion

We advise the Commission to reconsider this issue thoroughly and abandon the idea of trying to set up a special credit system for VET. Even if the Commission were to succeed in getting such a system off the ground – which is extremely doubtful given its present state – that system will most likely not gain acceptance in the higher education sector. This would be a disaster for a learner who wants his/her learning outcomes to be validated and recognized as part of a formal degree. Such a learner would be entirely justified in feeling misled.

We are committed to collaborate in a constructive way with our colleagues from the VET sector to develop ECTS further into a credit system which may be even more suitable for various kinds and contexts of learning.

On the basis of this statement we offer the following answers to your five questions you have put forward for consultation:

#### 1. The purpose of and reasons for an ECVET system

From the above statement it can be learned that the national academic contact points see no added value for ECVET given the existing European Credit Transfer and Accumulation System.

#### 2. The technical basis for ECVET

As stated above ECVET has not left the designing stage. A workable methodology has not yet been developed.

### 3. Implementing ECVET

While ECVET has not developed into a system with clear features, there is no basis for implementing. As stated before the national contact points propose to abandon the idea of setting up a separate credit system for the VET sector.

### 4. Measures for supporting the implementation and development of ECVET

The national academic points advise to reconsider the initiative and abandon the idea of setting up a special credit system for the VET sector.

### 5. ECVET's potential for enhancing mobility

Credit system in general are a crucial tool for enhancing mobility and its quality. However, this objective can also be reached by a system, ECTS, which has been widely accepted and thoroughly tested. Therefore, the national contact points see no arguments to set up a competing system, because ECTS can encompass all types of learning.

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